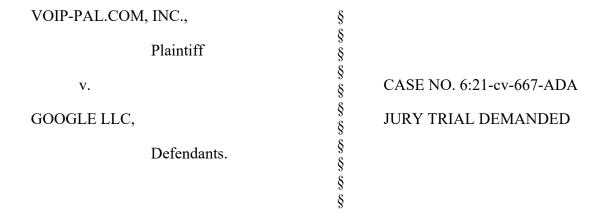
IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION



DECLARATION OF ROBERT W. UNIKEL IN SUPPORT OF DEFENDANT GOOGLE LLC'S OPPOSED MOTION TO TRANSFER

- I, Robert W. Unikel, declare as follows:
- 1. I am an attorney with the law firm Paul Hastings LLP and counsel for Defendant Google LLC ("Google"). I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters set forth herein.
- 2. VoIP-Pal.com, Inc. ("VoIP-Pal") asserted U.S. Patent Nos. 8,630,234 ("the '234 Patent") and 10,880,721 ("the '721 Patent") (collectively, the "Asserted Patents") against Google, T-Mobile US Inc., Cellco Partnership (d/b/a Verizon Wireless), AT&T Corp., Apple Inc., Amazon.com Inc., and Facebook Inc.
- 3. Verizon, Apple, and AT&T filed Declaratory Judgment actions on the Asserted Patents in the Northern District of California, which were assigned to Judge James Donato. *See* Exhibit A, summarizing the waves of litigations brought by VoIP-Pal.
- 4. Attached hereto as Exhibit A is a table summarizing the waves of cases brought by VoIP-Pal against various defendants.

- 5. Attached hereto as Exhibit B is a true and correct copy of VoIP-Pal's form 10-K filing.
- 6. Attached hereto as Exhibit C is a true and correct copy of U.S. Patent No. 10,218,606.
 - 7. Attached hereto as Exhibit D is a true and correct copy of the '234 Patent.
 - 8. Attached hereto as Exhibit E is a true and correct copy of the '721 Patent.
- 9. Johan Emil Viktor Björsell is a named inventor on all of the patents from this case and the prior waves (summarized in Exhibit A).
- 10. VoIP-Pal alleges that particular functionalities of Google Fi and Google Hangouts infringe the Asserted Patents.
- 11. Attached hereto as Exhibit F is a true and correct copy of the website for "Virtual office Waco Location" located at 7215 Bosque Blvd. Waco, TX 76710.
- 12. Attached hereto as Exhibit G is a true and correct copy of a LexisNexis Public Records: SmartLinx Comprehensive Business report for the street address 7215 Bosque Blvd. Waco, TX 76710.
- 13. Attached hereto as Exhibit H is a true and correct copy of an S&P Global Market Intelligence report regarding the VoIP-Pal board members.
- 14. Attached hereto as Exhibit I is a true and correct copy of a screenshot of an article on the Dialpad webpage, describing the Dialpad prior art.
- 15. Attached hereto as Exhibit J is a true and correct copy of a screenshot of an article "Have Number Will Travel" describing the GrandCentral prior art.
- 16. Attached hereto as Exhibit K is a true and correct copy of a press release from July3, 2007 entitled "Google acquires Web-calling service GrandCentral".

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17. Attached hereto as Exhibit L is a true and correct copy of the LinkedIn profile for

Craig Walker, listing his location as San Francisco, California.

18. Attached hereto as Exhibit M is a true and correct copy of the LinkedIn profile for

Vincent Paquet, listing his location as San Francisco Bay Area.

19. Attached hereto as Exhibit N is a true and correct copy of Cub Club Inv., LLC v.

Apple, Inc., No. 6:20-cv-00856-ADA, Dkt. 28.

20. Attached hereto as Exhibit O is a true and correct copy of Google flights from

Stockholm, Sweden to San Francisco, California sorted by duration.

21. Attached hereto as Exhibit P is a true and correct copy of Google flights from

Stockholm, Sweden to Waco, Texas sorted by duration.

22. Attached hereto as Exhibit Q is a true and correct copy of an "Overview for Alan

D. Albright of W.D. Tex." from Lex Machina.

23. Attached hereto as Exhibit R is a true and correct copy of an "Overview for N.D.

Cal." from Lex Machina.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11

day of November in Chicago, Illinois.

/s/ Robert W. Unikel

Robert W. Unikel

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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on November 11, 2021, all counsel of record who have appeared in these cases are being served with a copy of the foregoing via the Court's CM/ECF system.

<u>/s/ Paige Arnette Amstutz</u>
Paige Arnette Amstutz